

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Nautilus Insurance Company,)	C/A No. 2:22-cv-1307-RMG
)	
Plaintiff,)	
Versus)	
)	
Richard Alexander Murdaugh, Sr., Cory)	DEFENDANT
Fleming, Moss & Kuhn, P.A., Chad)	MOSS & KUHN, P.A.'S COUNTER-
Westendorf, and Palmetto State Bank,)	DESIGNATIONS TO PLAINTIFF'S ALL
)	
Defendants.)	

TO: THE HONORABLE RICHARD M. GERGEL, PRESIDING JUDGE FOR THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, CHARLESTON DIVISION:

The Defendant Moss & Kuhn, P.A. (hereinafter “this Defendant”), hereby submits the following Counter designations to Plaintiff’s Designation.:

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH, Sr.,
et al.,

Defendants.

Case No. 2:22-cv-1307-RMG

**NAUTILUS INSURANCE COMPANY'S
DEPOSITION DESIGNATIONS**

DEPOSITION DESIGNATION FORM

DEPONENT NAME: Chad Westendorf

DATE OF DEPOSITION: June 30, 2023

OFFERING PARTY: Nautilus Insurance Company

Nautilus Insurance Company DESIGNATION	<small>[party]</small> OBJECTION EXPLAIN BASIS OF	<small>[party]</small> COUNTER DESIGNATION	<small>[party]</small> OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
page 5:11-24		page ____ lines ____ - ____	
page 7:5-11		page ____ lines ____ - ____	
pages 14:23 – 15:3		page ____ lines ____ - ____	

OFFERING PARTY: Nautilus Insurance Company

Nautilus Insurance Company DESIGNATION	[party] OBJECTION EXPLAIN BASIS OF	[party] COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
Page 10:1-11		page _____ lines _____ - _____	
Pages 13:7 – 14:3		page _____ lines _____ - _____	
Pages 16:20 – 17:4		page _____ lines _____ - _____	
Pages 23:18 – 24:21		page _____ lines _____ - _____	
Page 28:1-13		page _____ lines _____ - _____	
Page 34:11-17		page <u>34</u> lines <u>18</u> - <u>23</u>	
Page 34:23-24		page _____ lines _____ - _____	
Page 36:9-19		page <u>37</u> lines <u>25</u> - _____ page 39, line 23	
Page 38:9-11		page _____ lines _____ - _____	
Pages 39:24 - 40:20		page <u>40</u> lines <u>21</u> - <u>25</u>	
Page 41:9-15		page <u>41</u> lines <u>1</u> - <u>8</u>	
Page 42:9-17		page <u>42</u> lines <u>19</u> - <u>25</u>	

Pages 43:22 - 44:8		page <u>43</u> lines <u>1</u> - <u>21</u>	
Page 46:12-16		page _____ lines _____ - _____	
Page 48:8-22		page _____ lines _____ - _____	
Pages 49:20 – 50:9		page _____ lines _____ - _____	
Pages 59:23 – 60:8		page _____ lines _____ - _____	
Pages 79:21 – 80:5		page <u>80</u> lines <u>6</u> - <u>12</u>	
Pages 81:21 – 82:5		page <u>98</u> lines <u>20</u> - <u>25</u>	
Pages 99:12 – 100:12		page <u>99</u> lines <u>1</u> - <u>11</u>	
Page 103:8-25		page <u>100</u> lines <u>13</u> - <u>24</u>	
Page 117:11-18		page <u>101</u> lines <u>9</u> - <u>16</u> p. 101, line 23 - 102, line 3	
Pages 118:6 – 119:14		page <u>103</u> lines <u>2</u> - <u>7</u> Page 117, line 19 - Page 118, line 5	

OFFERING PARTY: Nautilus Insurance Company

Nautilus Insurance Company DESIGNATION	[party] OBJECTION EXPLAIN BASIS OF	[party] COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION) OR INDICATE WITHDRAWAL OF DESIGNATION
pages 9:23 - 10:21		page <u>14</u> lines <u>1</u> - <u>25</u>	
page 13:2-25		page <u>15</u> lines <u>1</u> - <u>25</u>	
page 23:2-3,		page <u>16</u> lines <u>1</u> - <u>23</u>	
pages 23:7-18 to 23:22-25		page <u>23</u> lines <u>19</u> - <u>22</u>	
page 56:7-16		page <u>56</u> lines <u>17</u> - <u>25</u>	
pages 57:17 - 58:3		page <u>57</u> lines <u>1</u> - <u>25</u>	
pages 61:11 - 62:15		page <u>58</u> lines <u>1</u> - <u>6</u>	
page 69:5-17		page <u>69</u> lines <u>2</u> - <u>4</u>	
page 70:5-9		page <u>69</u> lines <u>18</u> - <u>25</u>	
pages 70:14-71:1		page <u>70</u> lines <u>1</u> - <u>4</u>	
Page 71:10-14		page <u>70</u> lines <u>10</u> - <u>13</u> Page 71 lines 2-9	

OFFERING PARTY: NAUTILUS INSURANCE COMPANY

[party] DESIGNATION	[party] OBJECTION EXPLAIN BASIS OF	[party] COUNTER DESIGNATION	[party] OBJECTION (TO COUNTER DESIGNATION OR INDICATE WITHDRAWAL OF DESIGNATION
Page 9 Lines 9 to 12		Page <u>9</u> Lines <u>13</u> to <u>18</u>	
Page 12 Lines 19 to 20		Page <u>12</u> Lines <u>21</u> to <u>25</u>	
Page 14 Lines 14 starting with "in a private" to 21		Page <u>13</u> Lines <u>1</u> to <u>25</u> Page 14, lines 1-13 Page 14, lines 22-25	
Page 16 Lines 23 to 25		Page <u>15</u> Lines <u>1</u> to <u>10</u>	
Page 17 Lines 13 to 16		Page <u>15</u> Lines <u>16</u> to <u>25</u> Page 16, lines 1-6	
Page 25 Lines 1 to 7		Page <u>24</u> Lines <u>8</u> to <u>25</u> Page 25, lines 8-19	
Page 41 Lines 9 to 10		Page _____ Lines _____ to _____	
Page 41 Lines 17 to 25		Page _____ Lines _____ to _____	
Page 42 Lines 1 to 15 Page 43 Lines 9 to 15		Page <u>43</u> Lines <u>16</u> to <u>25</u> Page 44, Lines 1 - 11	
Page 44 Lines 12 to 17			

Page 44 Lines 20 to 25			
Page 48 Line 20 starting at “holding funds” to 25			
Page 49 Line 20 to 23		Page 50, Lines 3-25	
Page 53 Lines 20 to 25		Page 51, Lines 1-25 Page 52, Line 1	
Page 54 Lines 1 to 2		Page 54, Lines 3-12	
Page 56 Lines 22 to 25		Page 57, Lines 1-25 Page 58, Lines 1-7 Page 58, Lines 13-25	
Page 60 Lines 23 (Starting at “was”) to 25		Page 59, Lines 1-11	
Page 61 Lines 1 to 7			
Page 61 Lines 23 to 25			
Page 62 Lines 1			
Page 67 Lines 5 to 9			
Page 71 Lines 7 to 15			

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December 27, 2024

Charleston, South Carolina

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